

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

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Mail Processing Network Rationalization  
Service Changes, 2012

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Docket No. N2012-1

AMERICAN POSTAL WORKERS UNION, AFL-CIO,  
SUPPLEMENTAL MOTION FOR IMMEDIATE ACCESS TO  
NON-PUBLIC INFORMATION IDENTIFIED  
AS USPS-LR-N2012-1/NP14 and NP15  
(March 9, 2012)

On March 8, 2012, American Postal Workers Union, AFL-CIO (APWU), filed a Motion for Immediate Access to Non-Public Information Identified as USPS-LR-N2012-1/NP14 and NP15. Accompanying this Motion was the signed certifications of several APWU representatives, attorneys and consultants. However, three APWU consultants from Shorter Cycles, who are not locally based were unable to complete the necessary Statement of Compliance with Protective Conditions Certifications pursuant to 30 CFR 3007.40(b) in time to be filed yesterday. Relevant certifications have now been completed for the following individuals:

Marc Schiller  
Shorter Cycles  
Principal  
APWU Consultant

Sheppard Vars  
Shorter Cycles  
Senior Consultant  
APWU Consultant

Jim Lynch  
Shorter Cycles  
Senior Consultant  
APWU Consultant

A copy of the Certifications are attached hereto.

For the reasons stated in our March 8, 2012 Motion for Immediate Access, hereby incorporated by reference, APWU respectfully requests that the above named individuals be granted access to the non-public Library References USPS-LR-N2021-1/NP14 and NP15. Furthermore, APWU's March 8, 2012 Motion specified that the Postal Service has stated it has no objection to APWU's request for access to this information. Likewise, the Postal Service has indicated that it also does not object to the above named individuals accessing the material in Library References USPS-LR-N2021-1/NP14 and NP15. Therefore, APWU respectfully requests that the above named individual be granted immediate access to the above referenced non-public library references.

Persons identified by the Postal Service pursuant to Section 3007.2(c) have been provided with a copy of this Motion and accompanying certification today by email.

### **Conclusion**

For the forgoing reasons, APWU respectfully requests that access to Library References USPS-LR-N2021-1/NP14 and NP15 be immediately granted to the above named individual as set forth in this Motion.

Respectfully submitted,

Jennifer L. Wood  
Counsel for American Postal Workers Union, AFL-CIO

### CERTIFICATION

The undersigned represents that:

Access to these materials provided in the matter identified as **USPS-LR-N2012-1/NP15** by the Postal Service has been authorized by the Commission. The cover or label of the copy obtained is marked with my name. I agree to use the information only for purposes of analyzing matters at issue in the matter identified as **PRC Docket No. N2012-1**. I certify that I have read and understand the above protective conditions and am eligible to receive access to materials under paragraph 1 of the protective conditions. I further agree to comply with all protective conditions and will maintain these materials in strict confidence in accordance with all of the protective conditions set out above.

Name	<u>Sheppard Vars</u>
Firm	<u>Shorter Cycles LLC</u>
Title	<u>Sr. Consultant</u>
Representing	<u>ADWD</u>
Signature	<u>Sheppard Vars</u>
Date	<u>March 8, 2012</u>

### CERTIFICATION

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Name

Jim LYNCH

Firm

Shorter Cycles, LLC

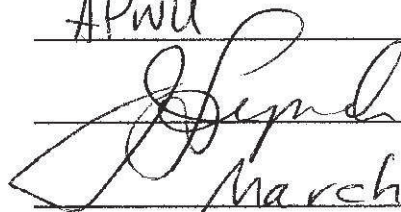
Title

Senior Consultant

Representing

APWU

Signature



Date

March 8, 2012

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Name

JIM LYNCH

Firm

Shorter Cycles, LLC

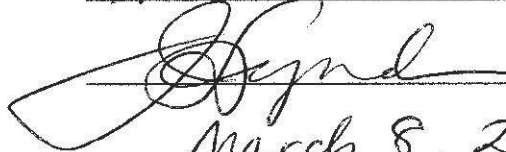
Title

Senior Consultant

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APWU

Signature



Date

March 8, 2012

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Name	<u>Marc Schiller</u>
Firm	<u>Shorter Cycles</u>
Title	<u>Principal</u>
Representing	<u>APWU</u>
Signature	<u>Mark A. Schiller</u>
Date	<u>3/8/2012</u>

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Name

Sheppard Vars

Firm

Shorter Cycles LLC

Title

Sr. Consultant

Representing

APWU

Signature

Sheppard Vars

Date

March 8, 2012

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Name	<u>Marc Schiller</u>
Firm	<u>Shorter Cycles</u>
Title	<u>Principal</u>
Representing	<u>APLU</u>
Signature	<u>John A. Schiller</u>
Date	<u>3/8/2012</u>